## **EXHIBIT 9**

## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA WAYCROSS DIVISION

COALITION FOR GOOD GOVERNANCE and DONNA CURLING,

Plaintiffs,

v.

COFFEE COUNTY BOARD OF ELECTIONS AND REGISTRATION,

Defendant.

Civil Action No. 5:23-mc-00001-LGW-BWC

In RE Subpoenas issued by the United States District Court For the Northern District of Georgia, Atlanta Division, Civil Action File No. 1:17-CV-2989-AT

## DECLARATION OF SUSAN GREENHALGH

SUSAN GREENHALGH declares the following to be true and correct under penalty of perjury, pursuant to 28 U.S.C. § 1746:

## **Description of Incremental Work Required by Coffee County Discovery Problems**

- I am of legal age and competent to provide this affidavit. All the information herein is based on my own personal knowledge unless otherwise indicated.
- 2. The declaration means to supplement my declaration executed

  February 20, 2024, to identify work done incrementally in response to
  information missing or withheld in the Coffee County discovery

- production, and for depositions that legal counsel has determined would likely not have been necessary if discovery obligations had been met.
- 3. On August 24, 2022, I spent .5 hours reviewing the outline for Ben Cotton's deposition. On September 4, 2022, I spent .75 hours rereading Cotton's deposition.
- 4. On November 14, 2022, I spent 1.75 hours reviewing documents and consulting with the CGG legal team in preparation of Blake Voyles deposition.
- 5. On Wednesday, November 22, 2023, I spent one hour reviewing records produced from the GBI's image of the Coffee County election supervisor's computer.
- 6. On Thursday, November 23, 2023, I spent .5 hour reviewing records produced from the GBI's image of the Coffee County election supervisor's computer.
- 7. On Sunday, November 26, 2023, I spent .75 hours consulting with the CGG team about documents obtained from the GBI image of the Coffee County election supervisor's computer.

- 8. In total, I spent 5.25 hours performing incremental work for the Coffee County discovery, that totals \$1,575 at my rate of \$300 per hour.
- 9. My previous declaration included the deposition-related time noted in paragraphs 3 and 4 above, of three hours, (or \$900), and should not be double counted.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 4<sup>h</sup> day of March, 2024.



[Amityville, New York]